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Date: 10-6-04

Docket No. 04 – AAER - 1 Docket Office California Energy Commission 1561 Ninth Street, Mail Station 4 Sacramento, CA 95814-5512

Subject: California Energy Commission Actions on Battery Chargers

Dear Sirs,

In reference to the September 2004 Draft of the Proposed CEC regulations for External Power Supplies (EPS) and Battery Chargers please consider the following:

- 1.) In section 1602 (s), CEC should use the same definition as EPA Energy Star uses in the Final version of the Energy Star Program for Single Voltage External Power Supplies.
- 2.) In section 1602 (s), CEC should exempt certain appliance battery chargers until an appropriate test procedure can be developed.
- 3.) In section 1604 (u) (1), CEC should utilize the latest version of the EPA Energy Star test Procedure. CEC should not use the February 13, 2004 version.

This initiative is of serious concern to BISSELL Homecare, Inc. because of the economic hardship it would cause. We do not anticipate being able to comply with the Proposed CEC regulations in a cost-effective manner, placing at risk \$40 to \$50 million of sales in rechargeable electrical products. This would be a substantial loss for our company, and it would also cost our customers and all consumers alike by limiting their choices in the marketplace and reducing the value of the products that are available for purchase.

Thank you for your consideration.

Sincerely,

Daniel L. Koltak

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